

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 1:22-cv-3639
)	
CHICAGO BASEBALL HOLDINGS, LLC,)	Judge Pacold
WRIGLEY FIELD HOLDINGS, LLC, WF)	
MASTER TENANT, LLC, and CHICAGO)	Magistrate Judge McShain
CUBS BASEBALL CLUB, LLC,)	
)	
Defendants.)	

JOINT STATUS REPORT

The parties, by their undersigned attorneys, submit this joint status report in accordance with the court's minute entry of March 1, 2023 (Dkt. 22):

(a) Progress of fact discovery: The parties continue to discuss matters relating to the production of requested documents, including a protective order that the defendants have requested, as well as outstanding differences relating to their respective written discovery responses. The parties have now exchanged written correspondence regarding these issues and expect to supplement their discovery responses and to produce additional documents in the next several weeks. The United States also continues to receive documents pursuant to the subpoenas referenced in the parties' prior joint status report (Dkt. 21), and the United States has issued five more subpoenas to third-party entities involved in the design and construction of Wrigley Field's 1060 Project. Given the nature of the renovation project at issue and the length of time over which the renovation has taken place, the amount of potentially responsive documents and other electronic information, both from defendants and subpoenaed third parties, is substantial. Productions by defendants and certain third parties are ongoing.

The parties now expect to complete outstanding document productions by late June to mid-July and to begin depositions in August. Both parties are in agreement that the majority of written discovery and document productions should be completed prior to depositions commencing. As mentioned previously, the United States will need to conduct an inspection of Wrigley Field, and the United States plans to contact the defendants about potential dates, depending on what remains outstanding in terms of document productions. The deadline to complete fact discovery is August 31, 2023. Dkt. 17. The parties anticipate that a modest extension of time to complete fact depositions may be necessary, but will revisit that issue with the court once document productions are substantially complete.

(b) Status of settlement discussions: The parties are not currently engaged in settlement discussions and do not request a settlement conference at this time. The parties will notify the court in the future if a settlement conference would be productive.

(c) Other matters: The parties do not have additional items to raise with the court at this time.

Respectfully submitted,

For the United States:

MORRIS PASQUAL
Acting United States Attorney

By: s/ Abraham J. Souza
PATRICK W. JOHNSON
ABRAHAM J. SOUZA
Assistant United States Attorneys
219 South Dearborn Street
Chicago, Illinois 60604
(312) 353-5327
(312) 353-1857
patrick.johnson2@usdoj.gov
abraham.souza@usdoj.gov

For Defendants:

s/ Teresa L. Jakubowski

MARK R. FILIP
Kirkland & Ellis LLP
300 North LaSalle Street
Chicago, Illinois 60654
(312) 862-2000
mark.filip@kirkland.com

TERESA L. JAKUBOWSKI (*Pro Hac Vice*)
Barnes & Thornburg LLP
1717 Pennsylvania Ave., N.W., Suite 500
Washington, D.C. 20006
(202) 289-1313
teresa.jakubowski@btlaw.com

JOHN F. KUENSTLER
Barnes & Thornburg LLP
One North Wacker Drive, Suite 4400
Chicago, Illinois 60606
(312) 338-5924
jkuenstler@btlaw.com